



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

January 26, 2024

**By ECF**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *SEC v. Ahmed et al.*, 23-cv-10210 (VSB)

Dear Judge Broderick,

Plaintiff Securities and Exchange Commission (“SEC”) and Defendants Nadim Ahmed, Mehreen Shah, NuRide Transportation Group, LLC, NYC Green Transportation Group, LLC, Med Trans EB-5, LLC, NYC EV Mobility LLC, Gravitas NYC Regional Center, LLC, and Mona Shah & Associates, PLLC (collectively “Defendants”) respectfully submit this joint letter requesting the Court’s approval of the following proposed briefing schedule in response to Defendants’ motions to dismiss filed on January 22, 2024 (DE 28 & 32) and requesting the Court’s permission for the SEC to file a single memorandum of law, not to exceed 35 pages, in opposition to Defendants’ two motions to dismiss.

Pursuant to Local Rule 6.1(b), the SEC’s opposition is due on February 5, 2024 and any defendant reply is due on February 12, 2024. Defendants’ motions include numerous arguments, which the SEC requests additional time to consider and properly address. Defendants likewise anticipate needing additional time to address the SEC’s opposition. For these reasons, the parties propose the following briefing schedule:

March 4, 2024: SEC’s Opposition to Defense Motions to Dismiss Due

April 1, 2024: Defendants’ replies to SEC’s Opposition Due

This is the parties’ first request for an extension of time to file opposition and reply briefs regarding Defendants’ motions to dismiss. For the foregoing reasons, the parties respectfully request that the Court approve the above proposed briefing schedule and permit the

Hon. Vernon S. Broderick

January 26, 2024

Page 2

SEC to file a single memorandum of law, not to exceed 35 pages, in opposition to Defendants' motions to dismiss.

Respectfully submitted,

s/ Chevon Walker

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